

US DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DAVID ELLIOT WERKING
An Indiana Resident, Plaintiff

v.

Case No. 1:19-cv-276
Hon. Paul L. Maloney

BETH EILEEN WERKING, AND
PAUL MICHAEL WERKING,
Michigan Residents, Defendants

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**MOTION FOR AN EXTENSION OF TIME FOR RESPONSE AND BRIEF IN
OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES the Defendants, Beth and Paul Werking, by and through undersigned counsel, pursuant to Rules 6(b) and 15(a)(3) of the Federal Rules of Civil Procedure, and move this Court for an order to extend time to file a response and brief in opposition to Plaintiff's Motion for Summary Judgment Pursuant to Federal Rule of Civil Procedure 56 in the above-titled action. In support hereof, Defendants show the following:

1. Plaintiff filed his Motion for Summary Judgment Pursuant to Federal Rule of Civil Procedure 56 on August 20, 2019.
2. The time for filing a response and brief in opposition has not yet expired.

3. This motion is not being made for the purpose of delay, but is being made based upon current assignments and the need for time to prepare a response.

4. Counsel for Plaintiff does not oppose this motion.

THEREFORE, Defendants respectfully request the Court for an order extending time to file a response and brief in opposition up to and including 18 October 2019.

This the 16th of September, 2019.

VANDEBROEK LAW PLLC

A handwritten signature in black ink, appearing to read 'Anne M. VanderBroek', is written over a horizontal line.

Anne M. VanderBroek (P81541)

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